

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  AKORN HOLDING COMPANY LLC, <i>et al.</i> <sup>1</sup>  Debtors.	Chapter 7  Case No. 23-10253 (KBO) (Jointly Administered)
George L. Miller, the Chapter 7 trustee of the bankruptcy estates of Akorn Holding Company LLC, <i>et al.</i> ,  Plaintiff,  vs.  Defendants Listed on Exhibit “1” to Proposed Orders,  Defendants.	Adv. No. See Exhibit “1” to Proposed Orders  <b><u>Related D.I.: 1388, 1401</u></b>

**CERTIFICATION OF COUNSEL REGARDING  
MOTION FOR ORDERS ESTABLISHING STREAMLINED PROCEDURES  
GOVERNING ADVERSARY PROCEEDINGS BROUGHT BY PLAINTIFF PURSUANT  
TO SECTIONS 502, 547, 548, AND 550 OF THE BANKRUPTCY CODE**

The undersigned counsel for George L. Miller, the Chapter 7 trustee of the bankruptcy estates of Akorn Holding Company LLC, *et al.* (the “Trustee”), hereby certifies as follows:

1. On May 8, 2025, the Trustee filed the *Motion for Orders Establishing Streamlined Procedures Governing Adversary Proceedings Brought by Plaintiff Pursuant to Sections 502, 547, 548, and 550 of the Bankruptcy Code* [D.I. 1388] (the “Motion”).

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<sup>1</sup> The Debtors in these chapter 7 cases, along with the last four digits of their federal tax identification numbers, and cases numbers are Akorn Holding Company LLC (9190), Case No. 23-10253 (KBO); Akorn Intermediate Company LLC (6123), Case No. 23-10254 (KBO); and Akorn Operating Company LLC (6184), Case No. 23-10255 (KBO). The Debtors’ headquarters is located at 5605 CenterPoint Court, Gurnee, IL 60031.

2. Pursuant to the Motion, objections were to be filed and served no later than May 29, 2025, at 4:00 p.m. (prevailing Eastern Time) (“Objection Deadline”).

3. Leadiant Biosciences Inc. (“Leadiant”) filed the *Limited Objection of Leadiant Biosciences, Inc. to Motion for Orders Establishing Streamlined Procedures Governing Adversary Proceedings Brought by Plaintiff Pursuant to Sections 502, 547, 548, and 550 of the Bankruptcy Code* [D.I. 1401]. The Trustee resolved this objection by the inclusion of additional language agreeable to Leadiant in the applicable order.

4. Also prior to the Objection Deadline, Kuehne + Nagel Services Ltd (“K&N”), the defendant in Adv. Proc. No. 25-50265, requested to be added to the schedule attached to the Over \$75,000 Order (as defined *infra*). K&N has thus been added as requested.

5. The Motion proposes the entry of two separate forms of order depending upon the amounts asserted in the Complaint: (1) one order for amounts in controversy less than or equal to \$75,000.00 (the “Under \$75,000 Order”); and (2) one order for amounts in controversy in excess of \$75,000.00 (the “Over \$75,000 Order”, and together with the Under \$75,000 Order, the “Orders”). Counsel to Leadiant has reviewed the revised Over \$75,000 Order and has no further comments.

5. A copy of the Under \$75,000 Order is attached hereto as **Exhibit A**. A copy of the Over \$75,000 Order, as revised, is attached hereto as **Exhibit B**. A comparison showing the changes from the original proposed version of the Over \$75,000 Order is attached as **Exhibit C**.

WHEREFORE, the Trustee respectfully requests that the Court enter the Orders at the earliest convenience of the Court.

[SIGNATURE PAGE TO FOLLOW]

Dated: June 6, 2025  
Wilmington, Delaware

**SAUL EWING LLP**

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Trustee of the Bankruptcy Estates of Akorn Holding  
Company LLC, et al.*